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July 17, 2025

**Via ECF**

The Honorable Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, New York 10007

Re: *The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al; Case No. 24-cv-07509 (DLC)*

Dear Judge Cote:

Pursuant to Section 1D of your Honor's Individual Rules & Practices in Civil Cases, the Parties respectfully submit this letter-motion to request an extension of time for all fact discovery and depositions to be extended in this action, which is now due on August 1, 2025, to and including September 2, 2025.

The requested extension is made in good faith by the Parties, not interposed for any undue delay, and will not affect the other dates set forth in the Court's Order dated April 25, 2025 (Dkt. 80). There has been no previous request for an extension of time in connection with this matter.

Respectfully submitted,

HERBSMAN HAFER WEBER  
& FRISCH, LLP

/s/Dorothy Weber  
Dorothy M. Weber, Esq.

/s/Rodney David Oliver  
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/s/Joe Cooley  
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